

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 7
)	
CAROL J. DELGADO,)	Case No. 20-08603
)	
Debtor.)	Hon. Deborah L. Thorne

**NOTICE OF TRUSTEE'S MOTION TO
RETAIN REAL ESTATE BROKER**

TO: See attached list

PLEASE TAKE NOTICE that on **June 2, 2022, at 9:00 a.m.**, I will appear before the Honorable Judge Deborah L. Thorne, or any judge sitting in that judge's place, and present the ***Trustee's Motion to Retain Real Estate Broker*** (the "**Motion**"), a copy of which is attached.

This Motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the Motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com>. Then enter the meeting ID.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID.

Meeting ID and password. The meeting ID for this hearing is 160 9362 1728. No password is required. The meeting ID and further information can also be found on Judge Thorne's web page on the Court's website.

If you object to this Motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the Motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the Motion in advance without a hearing.

Dated: May 26, 2022
Ronald R. Peterson (2188473)
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, Illinois 60654-3456
PH: 312-923-2981
FAX: 312-840-7381

Respectfully submitted,
GINA B. KROL, not individually but as
chapter 7 trustee for the estate of Carol J.
Delgado

By: /s/ Ronald R. Peterson
Special Counsel to the Trustee

CERTIFICATE OF SERVICE

I, Ronald R. Peterson, certify that on May 26, 2022, I caused a copy of the foregoing ***Notice of Motion*** and the following ***Trustee's Motion to Retain Real Estate Broker*** to be served upon the parties listed on the attached Service List that are registered with the Court's CM/ECF system, by electronic notification of the filing and to all others by First Class U.S. Mail, properly addressed and postage prepaid.

/s/ Ronald R. Peterson

SERVICE LIST

In re Delgado
20-08603

VIA ECF Notification:

- **Matthew C Abad** bknotice@klueverlawgroup.com
- **William D Cherny** bill@chernylaw.com, r42907@notify.bestcase.com
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- **Todd J Ruchman** amps@manleydeas.com
- **Timothy R Yueill** timothy@nevellaw.com

VIA FIRST CLASS U.S. MAIL:

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Carol J Delgado
209 N. Ft. Lauderdale Beach Blvd.
Fort Lauderdale, FL 33304-4365

Carol J. Delgado
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Jay Delgado
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Naperville, IL 60540-4405

Janaye A. Delgado
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Naperville, IL 60540-4405

Village Bank & Trust Company
c/o Sheryl A. Fyock
Latimer LeVay Fyock LLC
55 West Monroe Street, Ste 1100
Chicago, IL 60603-5128

Associated Bank National Association
c/o Quarles & Brady LLP
300 N. LaSalle St., Ste 4000
Chicago, IL 60654-3422

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CIBC Bank, USA
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Chicago, IL 60603-3403

Capital One Bank (USA). N.A.
By American InfoSource as agent
PO Box 71083
Charlotte, NC 28272-1083

Capital One Sparks
PO Box 30281
Salt Lake City, UT 84130-0281

Citibank Visa
PO Box 6241
Sioux Falls, SD 57117-6241

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Sioux Falls, SD 57117-6241

Internal Revenue Service
Centralized Insolvency Operations
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Philadelphia, PA 19101-7346

Nick J. Delgado
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Associated Bank
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Bank of America
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Oklahoma City, OK 73118-7901

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PO Box 30281
Salt Lake City, UT 84130-0281

Citibank, N.A.
5800 S Corporate Pl
Sioux Falls, SD 57108-5027

City of Naperville
Finance Department
PO Box 3020
Naperville, IL 60566-7020

Department of the Treasury
Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

Discover Personal Loans
PO Box 30954
Salt Lake City, UT 84130-0954

HSBC Bank, USA
PO Box 4657
Carol Stream, IL 60197-4657

Nationstar Mortgage LLC
d/b/a Mr. Cooper
Attn: Bankruptcy Dept
PO Box 619096
Dallas, TX 75261-9096

Discover Financial Services
502 E. Market St.
Greenwood, DE 19950-9700

HSBC Bank USA, N.A.
Attn: Business Services
2929 Walden Ave C17
Depew, NY 14043-2690

JB Architecture Group Inc.
1320 N Rt 59, Ste 124
Naperville, IL 60563-4297

Midwest Windows & Supply/Trimworks
800 Hicks Drive
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National Mortgage LLC
d/b/a Mr. Cooper
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Dallas, TX 75019-4620

NewRez LLC
d/b/a Shellpoint Mortgage Servicing
Bankruptcy Dept.
POB 10826
Greenville, SC 29603-0826

SOFI Lending Corp.
Attn: Lacey Hunsaker
2750 East Cottonwood Pkwy, Ste 300
Salt Lake City, UT 84121-7285

Roland Masonry & Construction
31W576 North Ave
West Chicago, IL 60185-1021

Chicago Title Land Trust Company, as
Trustee of Land Trust No. 8002368555
10 S LaSalle St, Suite 2750
Chicago, IL 60603

Nationstar Mortgage LLC
d/b/a Mr. Cooper
c/o Manley Deas Kochalski LLC
PO Box 165028
Columbus, OH 43216-5028

On Deck Capital, Inc.
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New York, NY 10018-5300

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Healdsburg, CA 95448-4150

Village Bank and Trust
311 South Arlington Heights Rd
Arlington Heights, IL 60005-1957

ZHY Investments, LLC
1896 Sheridan Road #280
Highland Park, IL 60035-2655

Outsource Services LLC
Attn: Jay Delgado, Manager
18748 Tammy Drive
Mokena, IL 60448-9585

Ellsworth Investment Group LLC
Attn: Carol Delgado, Manager
119 S Ellsworth St
Naperville, IL 60540

US Bank Trust, N.A., as owner trustee for
VRMTG Asset Trust
c/o Johnson, Blumberg & Associates LLC
Attn: Karla M. Stepter
230 W. Monroe St. Suite 1125
Chicago, IL 60606

World Global Capital LLC
d/b/a YES FUNDING
30 Broad Street, 14th Fl, Ste. 14108
New York, NY 10004-2304

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 7
)	
CAROL J. DELGADO,)	Case No. 20-08603
)	
Debtor.)	Hon. Deborah L. Thorne
)	
)	Hearing: June 2, 2022 at 9:00 a.m.

TRUSTEE’S MOTION TO RETAIN REAL ESTATE BROKER

Gina B. Krol, not individually but solely as chapter 7 trustee (the “**Trustee**”) for the bankruptcy estate of Carol J. Delgado (the “**Debtor**”), respectfully moves (the “**Motion**”), pursuant to section 327 of the United States Bankruptcy Code (“**Bankruptcy Code**”), for entry of an Order authorizing the Trustee to retain a broker to market and sell certain parcels of real property in Naperville and Mokena, Illinois. In support of this Motion, the Trustee respectfully states as follows:

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) in which the Court may constitutionally enter a final order. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
2. This Motion is made pursuant to section 327 of the Bankruptcy Code and Rule 2014 of the Federal Rules of Bankruptcy Procedure.
3. On January 27, 2020 (the “**Petition Date**”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Florida. (Case No. 20-11045-PGH (Bankr. S.D. Fla.), Dkt. 1). On March 6, 2020, the Debtor’s chapter 11 case was transferred to the United States Bankruptcy Court for the Northern District of Illinois. On June 11, 2020, the Debtor’s chapter 11 case was converted to chapter 7. Thereafter, the U.S. Trustee appointed Gina B. Krol as chapter 7 trustee. (Dkt. 51).

4. As set forth in greater detail in the *Trustee's Initial Motion for Turnover of Property*, which the Trustee is filing contemporaneously with this motion, the Debtor's bankruptcy estate holds valuable interests in numerous real properties, including the properties commonly known as: (i) 13043 W. Regan Road in Mokena, Illinois; (ii) 18748 Tammy Drive in Mokena, Illinois; and (iii) 119 S. Ellsworth St. in Naperville, Illinois (collectively, the "**Properties**").

5. As there appears to be unencumbered equity in the Properties available for distribution to creditors, the Trustee respectfully requests that this Court authorize the Trustee to retain Millennium Properties Real Estate as her broker ("**Millennium**" or the "**Broker**") to market and sell the Properties.

6. Affidavits testifying to Millennium's disinterestedness are attached hereto as **Exhibit A**.

7. Millennium's compensation will be based upon the sale price received for the Properties and will be equal to five percent (5%) of the gross sale prices of each of the Properties. Millennium's compensation will be six percent (6%) of the gross sale prices of each of the Properties if a cooperating broker is involved in the marketing and sale of the Properties. Millennium will also receive a \$2,000 marketing budget for each Property, to be reimbursed from the proceeds of each Property at closing.

8. By this Motion, the Trustee seeks entry of an Order, substantially in the form attached hereto, authorizing the Trustee, pursuant to section 327 of the Bankruptcy Code, to retain Millennium as her broker with respect to the Properties on the terms set forth herein.

NOTICE

9. Notice of this Motion has been provided to (a) the Office of the United States Trustee; (b) the Debtor; (c) all creditors; (d) all parties who have filed appearances in this chapter

7 case; and (e) any other party who has requested notice in this Bankruptcy Case. Under the circumstances, the Trustee believes that the notice given is sufficient and appropriate.

CONCLUSION

WHEREFORE, the Trustee respectfully requests that the Court enter an order, substantially in the form attached hereto, authorizing her to retain Millennium as her broker, and granting such other relief as may be just.

Dated: May 26, 2022

Respectfully submitted,

GINA B. KROL, not individually but as
chapter 7 trustee for the estate of Carol J.
Delgado

By: /s/ Ronald R. Peterson

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